

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

DIANE T. CLARKE, ILANA KOPMAR, ISAAC
ALTMAN and DAVID ROSENFELD,

Plaintiffs,

-against-

Case No.: 2:23-cv-08869

THE ASSOCIATION OF LEGAL AID
ATTORNEYS, AMALGAMATED LOCAL UNION
2325 OF THE INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE AND
AGRICULTURAL IMPLEMENT WORKERS OF
AMERICA (UAW), AFL-CIO, LISA OHTA, BRET J.
TAYLOR, JEREMY BUNYANER, EMILY C.
EATON, MARTYNA KAZNOWSKI, GILLIAN R.
KRESS, IOANA CALIN, and PUJA PAUL,

**DECLARATION OF DIANE T.
CLARKE IN OPPOSITION TO
DEFENDANTS' MOTION TO
DISSOLVE THE TEMPORARY
RESTRAINING ORDER**

Defendants.

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I, DIANE T. CLARKE, declare as follows:

1. I am one of the Plaintiffs in the above-referenced action.
2. I am an attorney licensed to practice law in the State of New York.
3. I am employed by the Legal Aid Society of Nassau County, operating as a Public


Defender in and for the County of Nassau within the State of New York.

4. I am a dues-paying member of the Association of Legal Aid Attorneys
Amalgamated Local Union 2325 of the International Union, United Automobile, Aerospace and
Agricultural Implement Workers of America (UAW), AFL-CIO ("ALAA").

5. Attached hereto as Exhibit A is a true and accurate copy of a purported digest of
select statements and positions on matters of public concern by the ALAA. Exhibit A was
circulated from the account in the name of the former president of ALAA on the union's
messaging platform.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
and correct.

Executed on this 12th day of December 2023



Diane T. Clarke